

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

M.M.C., ON HER OWN BEHALF AND)	
ON BEHALF OF HER MINOR CHILDREN,)	
M.C.C. AND A.T.C. AND N.A.B., ON HIS)	
OWN BEHALF AND ON BEHALF OF HIS)	
MINOR CHILD, N.A.C.,)	C.A. No. 23-cv-158-WES-LDA
Plaintiffs,)	
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
Defendant.)	

MOTION FOR A STAY

Defendant, the United States of America, by and through undersigned counsel, respectfully informs the Court that the parties are currently engaged in settlement discussions and therefore request a stay in this matter for 45-days, to allow the parties to explore settlement. The hearing on the Defendant's Motion To Dismiss in the above-captioned matter is currently set for December 13, 2023. Plaintiffs' counsel has informed the undersigned that Plaintiffs agree that a stay is appropriate.

Respectfully submitted,

UNITED STATES OF AMERICA

By its Attorneys,

ZACHARY A. CUNHA
United States Attorney

/s/ Leslie J. Kane
LESLIE J. KANE
Assistant U.S. Attorney
One Financial Plaza, 17th Floor
Providence, RI 02903
(401) 709-5059
(401) 709-5017 (fax)
Email: leslie.kane@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of December, 2023, I electronically filed the within Motion for A Stay with the Clerk of the United States District Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically:

Kathryn C. Thornton
Natalia Mercado Violand
Nicholas Curry
Ropes & Gray LLP
2099 Pennsylvania Avenue, NW
Washington, DC 20006-6807
Tel: (202) 508-4600/Fax: (202) 508-4650
kathryn.thornton@ropesgray.com
natalia.mercadovioland@ropesgray.com
nick.curry@ropesgray.com

Dennis Coleman
Andrew J. O'Connor
Ropes & Gray LLP
800 Boylston Street
Boston, MA 02199-3600
Tel: (617) 951-7000/Fax: (617) 951-7050
dennis.coleman@ropesgray.com
andrew.oconnor@ropesgray.com

Brian Lebow
Samantha Gagnon
Heesoo Park
Ropes & Gray LLP
1211 Avenue of the Americas
New York, NY 10036-8704
Tel: (212) 596-9000/Fax: (212) 596-9090
brian.lebow@ropesgray.com
samantha.gagnon@ropesgray.com
heesoo.park@ropesgray.com

/s/ Leslie J. Kane
LESLIE J. KANE
Assistant U.S. Attorney